

09-10-07

9/10/13

John Murray

From: Mary Michelman
Sent: Friday, September 07, 2007 1:02 AM
To: Doug Halley; Stephen Anderson; John Murray; Jane Ceraso; Jim Deming;
Chris@ActonWater.com; Andrew Magee
Subject: Draft ACES request, WR Grace monitoring
Attachments: Monitoring Plan Sept 3 2007 Draft Comments.doc

Hi fellow Acton stakeholders,

FYI, I've attached a draft ACES request for an additional monitoring well location at the WR Grace Site, given some new information since we all submitted comments last December. (As of last week, EPA had not signed off on the monitoring plan yet.)

Mary

9/7/2007

DRAFT ACES Comments

Dear Derrick,

ACES respectfully requests that monitoring well AR-15 be included in the annual monitoring for VOCs and inorganics at the WR Grace Superfund Site in Acton.

The request for AR-15 sampling is being made at this time, rather than as part of ACES earlier comments on the proposed draft monitoring plan, because new information has come forward since ACES submitted those comments on December 12, 2006. This additional information includes:

- EPA's Comments on the Draft Landfill Area Pre-Design Work Plan, April 3, 2007
- 2006 Monitoring Program Report, April 24, 2007
- Acton stakeholder conference call with EPA & DEP, May 22, 2007

Reasons for this request include:

- **Question about western extent of landfill plume:** EPA comment # 2 in its April 3, 2007 comments on the Draft Landfill Area Pre-Design Work Plan stated in part:

"Since the overburden aquifer may be as much as 50 feet thick beneath the lowest sampling point, there seems to be a previously unsuspected data gap in the lower overburden and bedrock west of LF-19. In order to determine the lateral limit (western edge) of the part of the plume that is being remediated (the part in which the 1,1-dichloroethene, or VDC, concentrations are >60 ug/L), a well cluster should be installed in the vicinity of B-03. This cluster would provide data to evaluate the extent of the plume and to confirm that it is not a threat to the Assabet wells or WRG-3. It would also provide a point for measuring water levels during the pilot test and the long-term monitoring program."

- **EPA Proposal for additional monitoring well installation was tabled:** According to a May 22, 2007 conference call that EPA and DEP held with the Acton stakeholders, the Government Parties had agreed in an earlier May 2007 conference call with WR Grace, to table EPA's request for the installation of an additional monitoring well cluster near B-03.
- **Location:** AR-15 is one of the existing monitoring well sites closest to monitoring well B-03. It is located between the major portion of the VOC plumes in the landfill area and WRG-3, a well that the Acton Water District is actively pursuing as a future public water supply well.
- **Easily obtained data, given the tabled proposal:** Sampling of the existing AR-15 could be a way of obtaining additional data about the extent of contamination in the area in question, without the time and expense of the installation of a new monitoring well cluster. The AR-15 well cluster has four separate sampling intervals at a range of depths.
- **Not sampled since 2000/2001:** EPA comment # 3 in its April 3, 2007 comments on the Draft Landfill Area Pre-Design Work Plan suggested citing data from monitoring wells AR-03 and AR-15 as evidence that there is some distance between the western edge of the VDC plume and WRG-3. However, while AR-15 was sampled in 2000 and 2001, a review of the annual monitoring reports since then shows that it has not been monitored for water quality since 2001.
- **VDC at Sinking Pond:** The 2006 annual monitoring results, (report dated April 24, 2007), included a detection of VDC above the drinking water standard along the eastern edge of Sinking Pond, at AR-03. This well had been below the VDC drinking water standards in the annual monitoring conducted in 2003 through 2005. Additional monitoring, both spatially (adding in AR-15), and temporally (resampling AR-03 in 2007 and the future), will help determine whether

the 2006 detection was just a fluctuation around the drinking water standard level, or a sign of additional migration of VOCs towards Sinking Pond and the area of WRG-3.

Again, please include AR-15 in the annual monitoring for VOCs and inorganics at the WR Grace Site. Thank you for your consideration.

Sincerely,